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30
31 UNITED STATES DISTRICT COURT
32 NORTHERN DISTRICT OF CALIFORNIA
33 SAN FRANCISCO DIVISION

34 WAYMO LLC,

35 Plaintiff,

36 v.

37 UBER TECHNOLOGIES, INC.,
38 OTTOMOTTO LLC; OTTO TRUCKING LLC,

39 Defendants.

40 Case No. 3:17-cv-00939-WHA

41 **DECLARATION OF MARTHA L.
42 GOODMAN IN SUPPORT OF
43 DEFENDANTS' OPPOSITIONS TO
44 WAYMO'S MOTIONS IN LIMINE NOS. 1,
45 13, 14, 15 AND 17**

46 Judge: Hon. William H. Alsup

47 Trial Date: October 10, 2017

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2 I, Martha L. Goodman, declare as follows:
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5 1. I am an associate at the law firm Boies Schiller Flexner LLP representing Defendants
6 Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in
7 good standing of the Bar of the District of Columbia. I make this declaration in support of Defendants’
8 Briefs in Opposition to Waymo’s Motions *in Limine* Nos. 1, 13, 14, 15 and 17. I make this declaration
9 based on personal knowledge and if called as a witness, I could and would competently testify to the
10 matters set forth herein.
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12 2. Attached as **Exhibit 28** is a true and correct copy of an excerpt from a document
13 produced by Uber in this action bearing the Bates numbers UBER000060504.
14

15 3. **Exhibits 29 and Exhibit 30** have been intentionally left blank.
16

17 4. Attached as **Exhibit 31** is a true and correct copy of a document produced by Waymo in
18 this action bearing the Bates numbers WAYMO-UBER-00021132 through WAYMO-UBER-00021133.
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20 5. Attached as **Exhibit 32** is a true and correct copy of a document produced by Waymo in
21 this action bearing the Bates numbers WAYMO-UBER-00001496 through WAYMO-UBER-00001499.
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23 6. Attached as **Exhibit 33** is a true and correct copy of a document produced by Waymo in
24 this action bearing the Bates numbers WAYMO-UBER-00032547.
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26 7. Attached as **Exhibit 34** is a true and correct copy of a document produced by Waymo in
27 this action bearing the Bates numbers WAYMO-UBER-00033705.
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8. Attached as **Exhibit 35** is a true and correct copy of a document produced by Uber in this
action bearing the Bates numbers UBER00301331 through UBER00301339.
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9. Attached as **Exhibit 36** is a true and correct copy of a document produced by Waymo in
this action bearing the Bates numbers WAYMO-UBER-00047062 through WAYMO-UBER-00047063.
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10. Attached as **Exhibit 37** is a true and correct copy of a document produced by Waymo in
this action bearing the Bates numbers WAYMO-UBER-00022238.
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11. Attached as **Exhibit 38** is a true and correct copy of a document produced by Waymo in
this action bearing the Bates numbers WAYMO-UBER-00041064-WAYMO-UBER-00041065.
32

12. Attached as **Exhibit 39** is a true and correct copy of a document produced by Waymo in
this action bearing the Bates numbers WAYMO-UBER-00086800-WAYMO-UBER-00086808.
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13. Attached as **Exhibit 40** is a true and correct copy of a document produced by Waymo in this action bearing the Bates numbers WAYMO-UBER-00086815-WAYMO-UBER-00086816.

14. Attached as **Exhibit 41** is a true and correct copy of a document produced by Waymo in this action bearing the Bates numbers WAYMO-UBER-00083658-WAYMO-UBER-00083660.

15. Attached as **Exhibit 42** is a true and correct copy of a document produced by Waymo in this action bearing the Bates numbers WAYMO-UBER-00084600-WAYMO-UBER-00084601.

16. Attached as **Exhibit 43** is a true and correct copy of a document produced by Waymo in this action bearing the Bates numbers WAYMO-UBER-00086836.

17. Attached as **Exhibit 44** is a true and correct copy of excerpts of a document produced by Waymo in this action bearing the Bates numbers WAYMO-UBER-00086885-WAYMO-UBER-00086892.

18. Attached as **Exhibit 45** is a true and correct copy of a document produced by Uber in this action bearing the Bates number UBER00077210.

19. Attached as **Exhibit 46** is a true and correct copy of a document produced by Waymo in this action bearing the Bates numbers WAYMO-UBER-00086932-WAYMO-UBER-00086939.

20. Attached as **Exhibit 47** is a true and correct copy of a document produced by Waymo in this action bearing the Bates numbers WAYMO-UBER-00004175-WAYMO-UBER-00004194.

21. Attached as **Exhibit 48** is a true and correct copy of excerpts of the deposition transcript of Gaetan Pennecot, dated April 20, 2017.

22. Attached as **Exhibit 49** is a true and correct copy of excerpts of the deposition transcript of Gaetan Pennecot, dated August 9, 2017

23. Attached as **Exhibit 50** is a true and correct copy of Defendants Uber Technologies, Inc. and Ottomotto LLC's Responses to Waymo's First Set of Common Interrogatories (Nos. 1-3), served July 28, 2017.

24. Attached as **Exhibit 51** is a true and correct copy of excerpts of the deposition transcript of Daniel Gruver, dated August 4, 2017.

25. Attached as **Exhibit 52** is a true and correct copy of Defendants Uber Technologies, Inc. and Ottomotto LLC's Responses to Waymo's First Supplemental Responses to Waymo's Second Set of

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2 Common Interrogatories (Nos. 4-7), served August 8, 2017.
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5 26. Attached as **Exhibit 53** is a true and correct copy of excerpts of the deposition transcript
6 of David Drummond, dated August 21, 2017.
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9 27. Attached as **Exhibit 54** is a true and correct copy of excerpts of the deposition transcript
10 of Michael Epstein, dated August 22, 2017.
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13 28. Attached as **Exhibit 55** is a true and correct copy of excerpts of the deposition transcript
14 of Jolie Sorge, dated August 21, 2017.
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17 29. Attached as **Exhibit 56** is a true and correct copy of excerpts of the deposition transcript
18 of Anthony Levandowski, dated August 22, 2017.
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21 30. Attached as **Exhibit 57** is a true and correct copy of excerpts of the deposition transcript
22 of Chris Urmson, dated August 24, 2017.
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25 I declare under penalty of perjury under the laws of the United States that the foregoing is true
26 and correct. Executed this 13th day of September, 2017, in Washington, DC.
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16 */s/ Martha Goodman*
17 _____
18 Martha L. Goodman
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